

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

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MAR 25 2003

FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

In Re)	
)	
Amendment of Section 73.202(b),)	MB Docket No. 02-136
Table of Allotments,)	RM-10458
FM Broadcast Stations)	
(Arlington, The Dalles, Moro and)	
Henniston, Oregon; Covington,)	
Frout Lake, Walla Walla and)	
College Place, Washington)	

TO: Assistant Chief, Audio Division
 Media Bureau

REPLY COMMENTS TO COUNTERPROPOSAL

Westend Radio, LLC ("Westend"), the licensee of Station KQFM(FM), Hermiston, Oregon [Facility ID #27076], respectfully submits its Comments in opposition to the counterproposal submitted by Two Hearts Communications, LLC ("Two Hearts"), the licensee of Station KHSS(FM), Walla Walla, Washington in the above-referenced proceeding. In response to a *Notice of Proposed Rulemaking*, Two Hearts has proposed that Station KQFM(FM) be directed to shift its operation on Channel from 263A to Channel 261 A. Two Hearts seeks this change in *allocation* in order that its facility, Station KHSS, may change its city of license from Walla Walla to

College Place. Washington, and upgrade its operation from Channel 264C-3 to Channel 264C-2.

Two Hearts' proposal requesting Westend to substitute Channel **261A** for Channel 263A is wholly unacceptable as it necessarily requires Station KQFM to relocate its existing transmitter location to a new transmitter site some 11.9 Km northwest of its city of license and almost 6 miles from its current site (*see* ¶5 of Two Hearts' *Counterproposal and Comments*). Westend has neither agreed nor consented to such a move and Two Hearts offers to legal precedent in support of such an extraordinary request. Accordingly, Westend respectfully requests that the *Comments and Counterproposal* submitted by Two Hearts seeking to force an unwanted channel and site change on Station KQFM be denied.

DATED this 25th day of March, 2003.

WESTEND RADIO, LLC

/s/ J. Dominic Monahan

J. Dominic Monahan, Its Counsel

CERTIFICATE OF SERVICE

I, Nancy Lee Kemper, a secretary in the law offices of Luvaas, Cobb, Richards & Frasier, P.C., certify that I have on this 25th day of March, 2003 sent by United States mail, postage prepaid, on behalf of WESTEND RADIO, LLC, copies of the foregoing REPLY COMMENTS TO COUNTERPROPOSAL to:

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